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8 Bitmain Technologies, Ltd.

9  
10 **UNITED STATES DISTRICT COURT**  
11 **NORTHERN DISTRICT OF CALIFORNIA**  
12 **SAN FRANCISCO DIVISION**

13  
14 GOR GEVORKYAN, on behalf of himself and  
all others similarly situated,

15 Plaintiff,

16 v.

17 BITMAIN, INC., BITMAIN  
18 TECHNOLOGIES, LTD., and DOES 1 to 10,

19 Defendants,

Case No. 3:18-cv-07004-JD

**DECLARATION OF HANS  
CHRISTENSON IN SUPPORT OF  
DEFENDANT BITMAIN  
TECHNOLOGIES LTD.'S  
SUPPLEMENTAL MEMORANDUM  
OF LAW**

1 I, Hans Christenson, declare as follows:

2 1. I am Vice President, Account Executive, at USI Insurance Services, Inc. ("USI"). I  
3 am over the age of 18 and make this declaration of my own personal knowledge, and, if called as  
4 a witness, I could and would testify competently to the facts stated herein.

5 2. USI served as Bitmain Inc.'s insurance broker in connection with that company's  
6 commercial insurance policies.

7 3. In 2018, USI placed insurance coverage for Bitmain Inc. through Atlantic Specialty  
8 Insurance Co. ("Atlantic"). Initially, Atlantic issued its policies with "Bitmain Technologies Ltd." as  
9 the named insured. This was a clerical error on Atlantic's part. At all times, Bitmain Inc. was the  
10 intended insured on those policies, and no one at Bitmain Inc. or USI indicated to Atlantic that the  
11 named insured should be Bitmain Technologies Ltd.

12 4. USI discovered this error shortly after Atlantic issued the policy, and USI promptly  
13 requested an endorsement that corrected the policies to name Bitmain Inc. as the named insured.  
14 Atlantic issued that endorsement, which is attached as **Exhibit A**, on July 12, 2018.

15 5. I have reviewed Plaintiff's Exhibit 9, which appears to be a Premium Summary  
16 related to Bitmain Inc.'s commercial insurance policy. For the reasons explained above, this  
17 document names "Bitmain Technologies Ltd." in error.

18 I declare under penalty of perjury under the laws of the United States of America that the  
19 foregoing is true and correct. Executed this 30th day of June, 2020, at Seattle, Washington.

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21  
22 By: \_\_\_\_\_

23 Hans Christenson  
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